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Attorneys for Defendants

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

NAVAJO HEALTH FOUNDATION – SAGE  
MEMORIAL HOSPITAL, INC. (doing business  
as “Sage Memorial Hospital”); an Arizona non-  
profit corporation

Plaintiff,

v.

RAZAGHI DEVELOPMENT COMPANY,  
LLC; a Nevada limited liability company (doing  
business as “Razaghi Healthcare”), et al.,

Defendants.

Case No. 2:19-cv-00329-GMN-EJY

**JOINT STIPULATION TO  
EXTEND TIME FOR  
DEFENDANTS TO RESPOND TO  
PLAINTIFF’S FIRST AMENDED  
COMPLAINT [ECF No. 137]**

**(FIRST REQUEST)**

IT IS HEREBY STIPULATED AND AGREED that Defendants Razaghi  
Development Company, LLC, Ahmad Razaghi, and Tausif Hasan (collectively,  
“Defendants”) shall have a thirty-day extension of time, up to and including July 9, 2021 to  
respond to Plaintiff’s First Amended Complaint (ECF No. 137). The parties have so

1 stipulated due to defense counsel's current case load, which includes a recent evidentiary  
 2 hearing on an order to show cause for contempt and extensive pretrial obligations on a matter  
 3 set for trial in early August. The additional time requested herein will permit counsel for  
 4 Defendants to meet other pre-set case commitments and allow Defendants sufficient time to  
 5 respond to the First Amended Complaint. This request is made in good faith and not for the  
 6 purpose of delay. Neither party will be prejudiced by the requested extension. This is the  
 7 first request to extend this deadline.

8 For the reasons set forth above, the parties ask the Court to approve this stipulation  
 9 to extend the time for Defendants to respond to the First Amended Complaint from June 11,  
 10 2021 up to and including July 9, 2021.

11 RESPECTFULLY SUBMITTED this 10th day of June 2021.

12 JENNER & BLOCK LLP

FISHER & PHILLIPS LLP

13 /s/ Douglass A. Mitchell (with permission)  
 14 Douglass A Mitchell  
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 20 IT IS SO ORDERED:

21   
 22 UNITED STATES MAGISTRATE JUDGE

23 Dated: June 10, 2021  
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